

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA**

In re:	:	Chapter 13
	:	Case No. 5:19-bk-04566
PAOLA ANDREA MELGAREJO	:	
aka PAOLA A. MELGAREJO	:	
aka PAOLA MELGAREJO	:	
Debtor,	:	
	:	
ALLY FINANCIAL INC.,	:	
Movant,	:	Motion for
v.	:	Relief from Stay
PAOLA ANDREA MELGAREJO	:	
JACK N. ZAHAROPOULOS, Trustee	:	
Respondents	:	

**ANSWER TO MOTION OF ALLY FINANCIAL INC.
FOR RELIEF FROM STAY**

AND NOW COMES Respondent, Paola Andrea Melgarejo, by and through her attorneys, Newman Williams, P.C., and in Answer to the Motion for Relief from Ally Financial Inc. avers as follows:

1. Admitted.
2. Admitted.
3. Denied.
4. Denied to the extent the averments of paragraph 4 constitute anything other than a statement or conclusion of law or misplaced request for relief.
5. Admitted.
6. Denied. After reasonable investigation the Defendant is without knowledge sufficient to form a belief as to the truth of this averment and therefore it is denied.
7. Admitted.
8. Denied to the extent the averments of paragraph 8 constitute anything other than a statement or conclusion of law or misplaced request for relief.

9. Denied to the extent the averments of paragraph 9 constitute anything other than a statement or conclusion of law or misplaced request for relief.

10. Admitted.

11. Denied to the extent the averments of paragraph 11 constitute anything other than a statement or conclusion of law or misplaced request for relief. Movant has not alleged grounds for such extraordinary relief.

WHEREFORE, Respondent respectfully requests this Honorable Court issue an Order that the Motion of Ally Financial for Relief from Stay be denied, and for such other and further relief as the Honorable Court deems just and appropriate.

NEWMAN WILLIAMS, P.C.

By: /s/ Robert J. Kidwell
Robert J. Kidwell, Esquire
Attorney for Respondent, Paola Andrea Melgarejo
PO Box 511, 712 Monroe Street
Stroudsburg, PA 18360
(570) 421-9090; fax (570) 424-9739
rkidwell@newmanwilliams.com